

1 JONATHAN W. CARLSON, ESQ.  
Nevada Bar No. 10536  
2 *jcarlson@mbswc.com*  
FRANK A. TODDRE, II  
3 Nevada Bar No. 11474  
*ftoddre@mbswc.com*  
4 McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP  
5 8337 West Sunset Road, Suite 350  
Las Vegas, NV 89113  
6 Telephone: (702) 949-1100  
Facsimile: (702) 949-1101  
7 Attorneys for Defendant  
GEICO GENERAL INSURANCE COMPANY  
8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11  
12 CRAIG ZUCHELKOWSKI,

13 Plaintiff,

14 v.

15 GEICO GENERAL INSURANCE COMPANY,  
a Foreign Corporation; LEIGH AUBUCHON,  
16 an individual; DOES I through XX, inclusive;  
and ROE BUSINESS ENTITIES I through XX,  
17 inclusive,

18 Defendants.  
19

CASE NO. 2:20-cv-2182-GMN-EJY

~~**PROPOSED STIPULATION AND ORDER**~~  
**TO EXTEND DEADLINE TO FILE**  
**PROPOSED JOINT PRE-TRIAL ORDER**

**[SECOND REQUEST TO EXTEND**  
**SCHEDULING ORDER, FIRST TO**  
**SPECIFICALLY EXTEND JOINT PRE**  
**TRIAL ORDER DEADLINE]**

20 Defendant GEICO GENERAL INSURANCE COMPANY, by and through its attorneys of  
21 record of the law firm McCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP, and  
22 Plaintiff CRAIG ZUCHELKOWSKI, by and through his attorneys of record of the law firm PAUL  
23 PADDA LAW, PLLC, hereby stipulate to extend the deadline to file a Proposed Joint Pre-Trial Order  
24 in this matter from July 28, 2022, to August 1, 2022.

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PROPOSED STIPULATION AND ORDER  
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The reason for the brief extension is so that the parties may exchange final revisions of the Joint Pre Trial Order. While the parties had in good faith been working in finishing prior to the deadline, there was also a mutual question of whether the deadline would be stayed pursuant to LR 26-1(b)(5) which provides that if “dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.”

Given that GEICO’s outstanding motion to dismiss the extra contractual claims of relief<sup>1</sup> is still pending—but only partially dispositive of the matter—the parties were unsure whether the pleading was ensconced within the category of dispositive motions contemplated by this Rule. Out of an abundance of caution, the parties agreed to submit the joint pretrial order and with the acknowledgment they would amend if necessary following disposition of said Motion to Dismiss.

With this, the parties in good faith request a brief continuance to finalize their revisions and shall not request a second continuance for this date.

DATED this 28<sup>th</sup> day of July, 2022

PAUL PADDA LAW, PLLC

Bv /s/ Srilata R. Shah

PAUL S. PADDA, ESQ.  
Nevada Bar No. 10417  
SRILATA R. SHAH, ESQ.  
Nevada Bar No. 6820  
Attorneys for Plaintiff

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<sup>1</sup> ECF No. 22.

PROPOSED STIPULATION AND ORDER  
TO EXTEND DEADLINE TO FILE  
PROPOSED JOINT PRE-TRIAL ORDER  
CASE NO. 2:20-cv-2182-GMN-EJY

DATED this 28<sup>th</sup> day of June, 2022

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

By /s/ Frank A. Toddre, II  
JONATHAN W. CARLSON, ESQ.  
Nevada Bar No. 10536  
FRANK A. TODDRE, II  
Nevada Bar No. 11474  
Attorneys for Defendant GEICO GENERAL  
INSURANCE COMPANY

**IT IS SO ORDERED.**

DATED this 2nd day of August, 2022.

By   
UNITED STATES MAGISTRATE JUDGE